

M E M O R A N D U M

TO: Deputy Director, IC Staff

FROM:

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DATE: May 15, 1985

SUBJECT: Proposed COMPUSEC Uniform Safeguards Actions

The DICS forwarded the Report "Uniform SAFEGUARDS for Protection of Critical Systems' Processing Intelligence Information" to the DCI on 26 January 1985. In this SAFEGUARDS report, the DCI stated his intent to take several actions: namely;

1. To promulgate as mandatory standards for critical systems, the 29 SAFEGUARDS in the report.
2. To utilize, in a transitional stage, the SAFEGUARDS as complementary to DOD Computer Security Center qualified products, services and trusted system criteria.
3. To ensure that these above actions are implemented by the end of FY 86.

As you recall, an original set of 41 consensus-derived safeguards were identified in 1983 by an IC Task Group as necessary to protect against known vulnerabilities of SCI systems. These safeguards were intended to be the basis for mandatory and voluntary standards to be imposed by the DCI on electronic SCI-handling systems. In addition, the first SCI systems required to meet the mandatory standards were to be the thirteen critical systems so designated by the DDCI. The 41 SAFEGUARDS were used in the assessments of the 13 "critical systems." Thru this process, it was determined that a number of the 41 SAFEGUARDS could not be implemented without the development of "trusted systems" which are still being identified by the DoDCSC. As a result, the 41 SAFEGUARDS were revised to include 29 SAFEGUARDS that are achievable in the 13 "critical systems." As such the identified 29 safeguards served to meet the requirement for mandatory standards requested by the DDCI in his memo of 6 May 1983.

There is no standards process or infrastructure within NFIC that could adequately fund, develop, impose, monitor, and "police" COMPUSEC standards. Hence, the building of such a process and infrastructure took on a high priority in my COMPUSEC Project. During this same time period, January - July 1984, formative NSDD-145 actions were occurring which essentially precluded any Community-wide attention to this issue through my project. And indeed NSDD-145 as signed by the President on 17 September, 1984 addressed COMPUSEC standards responsibilities in such a manner as to make unclear and uncertain, the allowable actions by the DCI. A "first-look" interpretation would conclude that the DCI has no "authority" anymore in standards-setting in NFIC. In fact, the NTISSC under NSDD-145 has activated a working group to undertake COMPUSEC Standards activities. represents the DCI and the DDCI on this group.

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Proceeding along this line of reasoning does imply, however, that the DCI still has the distinctive authority for levying requirements and schedules for the standards required to permit COMPUSEC accreditation of SCI-handling systems. Still vague, are the issues relating to whom the requirements are levied upon, how firm can be the DCI's control over his needed standards-development activities, and what is his required schedule for standards imposition (under NSDD-145).

In terms of what the DCI "stated" that he would do in his transmitted Safeguards report of 22 January 1985, I believe that the DCI should sign out the following two memos. Also, he should sign them out as soon as possible because of the "support" they will provide to State and DIA both of whom are really trying to implement the Safeguards we developed.

Finally, it is still quite unclear as to how NTISSC with its Committee mode of action can get standards developed and can help NFIC members in obtaining funds to implement the standards.

I will be glad to help in any way to expedite this action.

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